

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

IN RE:

**John Reeves
Kathleen Reeves**

Debtors.

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CASE NO. 13-01101-FJO-7

**AMENDED MOTION TO REDEEM PROPERTY AND
NOTICE OF OBJECTION DEADLINE**

The debtor(s) hereby move(s) the Court, pursuant to 11 U.S.C. §722, for an order permitting the debtor(s) to redeem an item of tangible personal property from a lien securing a dischargeable consumer debt.

1. The item(s) of personal property involved are a Washer/Dryer Unit.
2. The debtor(s) originally purchased the property on or about 12/2010 and the original price was \$1,903.00
3. The debtor(s) have not obtained an appraisal; and believe the fair market value of the property to be \$500.00
4. The security interest of Capital One/Best Buy in the property is a dischargeable consumer debt.

PLEASE TAKE NOTICE THAT any objection must be filed with the Bankruptcy Clerk within 21 days of the date of this notice [or such other time period as may be permitted by Fed.R. Bankr.P 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. Mail, courier, overnight/express mail, or in person at:

Indianapolis
116 US Courthouse
46 E Ohio St.
Indianapolis, IN 46244

The objecting party must ensure delivery of the objection to the party filing the motion. **If an objection is NOT timely filed, the requested relief may not be granted.**

WHEREFORE, the debtor(s) move(s) the Court for an order permitting the debtor(s) to redeem the property by paying the creditor the proposed amount, finding that the remainder of the claim of said creditor is a dischargeable consumer debt, and granting such other relief as may be appropriate.

Respectfully submitted,

/s/ John Steinkamp

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the forgoing pleading was served on the following by US Mail, first class postage paid and/or via ECF on July 8, 2013

Bass & Associates, P.C.
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William Tucker, Chapter 7 Trustee

Nancy Gargula, US Trustee

/s/ John Steinkamp

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